

Intelligent Water Solutions, LLC v. Kohler, Co.
Joint Claim Construction Chart
EXHIBIT A: DISPUTED TERMS

'764 Patent	Plaintiff's Proposed Construction	Defendants' Proposed Construction	Court's Construction
<p>“system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet”</p> <p>1. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;</p>	<p>Not a means-plus-function claim; plain and ordinary meaning; or</p> <p>If M+F, alternatively:</p> <p>Function: receiving and processing signals</p> <p>Structure: control unit; microprocessor, central processing unit, input-output inter-face, digital processor, controller, and memory</p>	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p> <p><u>Function:</u> Receiving signals from said thermosensor and user interface and . . . processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet</p> <p><u>Structure:</u> Standalone controller, single task control logic unit, microprocessor, digital processor control unit, or CPU, and structural equivalents thereof</p>	

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<p>a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof; a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters; system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and a remote system monitoring/control device operable for bidirectional data transmission and reception between said remote monitoring/control device and said system control means and/or system sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said</p>		<p>This claim element is directed to software and the specification fails to “disclose an algorithm for performing the claimed function.” <i>Williamson v. Citrix Online, LLC</i>, 792 F.3d 1339, 1352 (Fed. Cir. 2015) (<i>en banc</i>). Therefore, the claim is indefinite.</p>	
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<p>remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters.</p> <p>26. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port; a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof; a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user</p>			
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<p>display means for displaying one or more system functions or parameters; system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and external data storage and input means for storing and transferring data to said system control means to control one or more system function(s) or parameter(s).</p> <p>10. The fluid delivery system of claim 1, wherein the system control means includes a microprocessor comprising a central processing unit (CPU) operably connected with an input/output (I/O) inter-face, random access memory (RAM), and read only memory (ROM).</p> <p>13. The fluid delivery system of claim 1, wherein the system control means includes a programmable digital processor which implements feedback control of one or more system parameters based on a control algorithm that is selected from a proportional, proportional plus integral, proportional plus</p>			
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integral plus derivative, or feed forward control algorithm.			
<p>“microprocessor comprising a central processing unit (CPU) operably connected with an input/output (I/O) inter-face, random access memory (RAM), and read only memory (ROM)”</p> <p>10. The fluid delivery system of claim 1, wherein the system control means includes a microprocessor comprising a central processing unit (CPU) operably connected with an input/output (I/O) inter-face, random access memory (RAM), and read only memory (ROM).</p>	Not a means-plus-function claim; plain and ordinary meaning	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p> <p><u>Function</u>: Receiving signals from said thermosensor and user interface and . . . processing said signals to generate appropriate control signals to control said supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet</p> <p><u>Structure</u>: This claim element is directed to software and the specification fails to “disclose an algorithm for performing the claimed function.” <i>Williamson v. Citrix Online, LLC</i>, 792 F.3d 1339, 1352 (Fed. Cir.</p>	

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		2015) (<i>en banc</i>). Therefore, the claim is indefinite.	
<p>“programmable digital processor which implements feedback control of one or more system parameters based on a control algorithm that is selected from a proportional, proportional plus integral, proportional plus integral plus derivative, or feed forward control algorithm”</p> <p>13. The fluid delivery system of claim 1, wherein the system control means includes a programmable digital processor which implements feedback control of one or more system parameters based on a control algorithm that is selected from a proportional, proportional plus integral, proportional plus integral plus derivative, or feed forward control algorithm.</p>	Not a means-plus-function claim; plain and ordinary meaning	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p> <p><u>Function</u>: Receiving signals from said thermosensor and user interface and . . . processing said signals to generate appropriate control signals to control said supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet</p> <p><u>Structure</u>: This claim element is directed to software and the specification fails to “disclose an algorithm for performing the claimed function.” <i>Williamson v. Citrix Online, LLC</i>, 792 F.3d 1339, 1352 (Fed. Cir.</p>	

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		2015) (<i>en banc</i>). Therefore, the claim is indefinite.	
<p>“remote system monitoring/control device operable for bidirectional data transmission and reception between said remote monitoring/control device and said system control means and/or system sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters”</p> <p>1. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply</p>	<p>Not a means-plus-function claim; plain and ordinary meaning</p>	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p> <p><u>Function</u>: (i) bidirectional data transmission and reception between said remote monitoring/control device and said system control means and/or system sensor(s) for remotely monitoring and controlling said one or more system functions or parameters; (ii) remotely generate signals to remote select said one or more system functions or parameters; and (iii) receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters</p> <p><u>Structure</u>: personal computer, electronic day planner, or computerized</p>	

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<p>valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port; a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof; a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters; system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and a remote system monitoring/control device operable for bidirectional data transmission and reception between said remote monitoring/control device and said system control means and/or system</p>		<p>building management system, and equivalents thereof</p> <p>This claim element is directed to software and the specification fails to “disclose an algorithm for performing the claimed function.” <i>Williamson v. Citrix Online, LLC</i>, 792 F.3d 1339, 1352 (Fed. Cir. 2015) (<i>en banc</i>). Therefore, the claim is indefinite.</p>	
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<p>sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters.</p> <p>4. The fluid delivery system of claim 1, wherein the remote system monitoring/control device sends and receives signals to and from the system control means and/or system sensor(s) via an electrical, infrared (IR), radio frequency (RF), internet, intranet, direct connect remote access, satellite, or laser control connection means.</p> <p>7. The fluid delivery system of claim 1, wherein the user interface input is a remote user input selected from a keypad, touchpad, joystick, roller, pen selector, voice input, or optical input integrated within the remote system monitoring/control device.</p>			
<p>“fluid supply control valve”</p>	<p>Plain and ordinary meaning</p> <p>Or, in the alternative:</p>	<p>Electronically controlled valve capable of opening and closing smoothly,</p>	

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<p>1. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising:</p> <p>a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid;</p> <p>a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof;</p> <p>a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;</p> <p>a fluid control valve for regulating flow of a mixed fluid flow at said system outlet;</p> <p>a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof;</p> <p>a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters;</p> <p>system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said</p>	<p>valve which regulates flow from a fluid supply</p>	<p>rapidly, and with adequate precision to achieve fine control of fluid supply</p>	
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<p>fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and</p> <p>a remote system monitoring/control device operable for bidirectional data transmission and reception between said remote monitoring/control device and said system control means and/or system sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters.</p> <p>26. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid;</p>			
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<p>a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof;</p> <p>a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;</p> <p>a fluid control valve for regulating flow of a mixed fluid flow at said system outlet;</p> <p>a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof;</p> <p>a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters;</p> <p>system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet;</p> <p>and</p> <p>external data storage and input means for storing and transferring data to said system</p>			
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control means to control one or more system function(s) or parameter(s).			
<p>“fluid control valve”</p> <p>1. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port; a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof; a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters;</p>	<p>Plain and ordinary meaning</p> <p>Or, in the alternative: valve which regulates the flow of a mixed fluid</p>	<p>“Flow control valve”</p> <p>Construed as: Electronically controlled valve capable of opening and closing smoothly, rapidly, and with adequate precision to achieve fine control of flow</p>	

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<p>system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and</p> <p>a remote system monitoring/control device operable for bidirectional data transmission and reception between said remote monitoring/control device and said system control means and/or system sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters.</p> <p>26. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from</p>			
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<p>corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port; a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof; a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters; system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and</p>			
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external data storage and input means for storing and transferring data to said system control means to control one or more system function(s) or parameter(s).			
“user interface input” 7. The fluid delivery system of claim 1, wherein the user interface input is a remote user input selected from a keypad, touchpad, joystick, roller, pen selector, voice input, or optical input integrated within the remote system monitoring/control device.	Plain and ordinary meaning Or, in the alternative: input to the user interface	Construed as “user input means for . . .” See AGREED definition of: “User input means for . . .” Alternatively, claim 7 is invalid as indefinite for lack of antecedent basis because there is no “user interface input” recited in independent Claim 1. <i>Halliburton Energy Servs. v. M-I LLC</i> , 514 F.3d 1244, 1249 (Fed. Cir. 2008).	
“fluid supply control valve actuator . . . for actuating opening and closure operations thereof” 1. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid;	Not a means-plus-function claim; plain and ordinary meaning If M+F, alternatively: Function: valve actuation Structure: control motor, stepper motor, solenoid, electronic valve controller, electric, pneumatic,	Means-plus-function term, governed by 35 U.S.C. § 112(f). <u>Function:</u> actuating opening and closure operations of a fluid supply control valve, which valve must be capable of opening and closing smoothly, rapidly, and with adequate precision to achieve fine control of	

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<p>a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof;</p> <p>a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;</p> <p>a fluid control valve for regulating flow of a mixed fluid flow at said system outlet;</p> <p>a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof;</p> <p>a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters;</p> <p>system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and</p> <p>a remote system monitoring/control device operable for bidirectional data transmission and reception between said remote</p>	<p>hydraulic, or magnetic driven motor</p>	<p>fluid supply, where the actuator moves a valve member in relationship to an associated valve seat to open or close the valve</p> <p><u>Structure</u>: electric, pneumatic, hydraulic, or mechanically driven motor, or solenoid, and structural equivalents thereof</p>	
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<p>monitoring/control device and said system control means and/or system sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters.</p> <p>26. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;</p>			
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<p>a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof; a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters; system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and external data storage and input means for storing and transferring data to said system control means to control one or more system function(s) or parameter(s).</p>			
<p>“flow control valve actuator . . . for actuating opening and closure operations thereof”</p> <p>1. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising:</p>	<p>Not a means-plus-function claim; plain and ordinary meaning</p> <p>If M+F, alternatively:</p>	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p> <p><u>Function</u>: actuating opening and closure operations of a flow control valve, which</p>	

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<p>a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid;</p> <p>a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof;</p> <p>a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;</p> <p>a fluid control valve for regulating flow of a mixed fluid flow at said system outlet;</p> <p>a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof;</p> <p>a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters;</p> <p>system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature,</p>	<p>Function: opening or closing a valve</p> <p>Structure: control motor, stepper motor, solenoid, electronic valve controller, electric, pneumatic, hydraulic, or magnetic driven motor</p>	<p>valve must be capable of opening and closing smoothly, rapidly, and with adequate precision to achieve fine control of flow, where the actuator moves a valve member in relationship to an associated valve seat to open or close the valve</p> <p><u>Structure:</u> electric, pneumatic, hydraulic, or magnetically driven motor, or solenoid, and structural equivalents thereof</p>	
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<p>flow rate and volume at said system outlet; and a remote system monitoring/control device operable for bidirectional data transmission and reception between said remote monitoring/control device and said system control means and/or system sensor(s) for remotely monitoring and controlling said one or more system functions or parameters, wherein said remote monitoring/control device operates to remotely generate signals to remotely select said one or more system functions or parameters, and wherein said remote monitoring/control device also operates to receive signals from said system control means and/or said one or more system sensor(s) to remotely monitor said one or more system functions or parameters.</p> <p>26. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof;</p>			
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<p>a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port;</p> <p>a fluid control valve for regulating flow of a mixed fluid flow at said system outlet;</p> <p>a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof;</p> <p>a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user display means for displaying one or more system functions or parameters;</p> <p>system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet;</p> <p>and</p> <p>external data storage and input means for storing and transferring data to said system control means to control one or more system function(s) or parameter(s).</p>			
<p>“memory means for entry and storage of user-defined temperature settings”</p>	<p>Not a means-plus-function claim; plain and ordinary meaning</p>	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p>	

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<p>6. The fluid delivery system of claim 1, wherein the thermosensor incorporates memory means for entry and storage of user-defined temperature settings.</p>	<p>If M+F, alternatively:</p> <p>Function: entry and storage of data</p> <p>Structure: computer memory</p>	<p><u>Function:</u> Entry and storage of user-defined temperature settings in a nonvolatile memory device</p> <p><u>Structure:</u> This claim term fails to recite sufficiently definite structure and the '764 patent fails to disclose any structure corresponding to the "memory means." <i>Williamson v. Citrix Online, LLC</i>, 792 F.3d 1339, 1351 (Fed. Cir. 2015) (<i>en banc</i>). Therefore, the claim is indefinite.</p>	
<p>"domestic water supply system"</p> <p>24. The fluid delivery system of claim 1 which comprises a domestic water supply system.</p>	<p>Not a means-plus-function claim; plain and ordinary meaning</p>	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p> <p><u>Structure:</u> Fig. 1, Fig. 3, Fig. 4, and equivalents thereof</p> <p>This claim term fails to recite sufficiently definite structure, and thus 35 U.S.C. § 112(f) applies. <i>Williamson v. Citrix Online, LLC</i>, 792 F.3d 1339, 1349 (Fed. Cir. 2015) (<i>en banc</i>)</p>	

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<p>“external data storage and input means for storing and transferring data to said system control means to control one or more system function(s) or parameter(s)”</p> <p>26. A fluid delivery system for controlling fluid temperature, flow rate and volume at a system outlet comprising: a fluid supply control valve for regulating flow of a first fluid and a second fluid from corresponding first and second fluid sources into a mixing port, wherein said first fluid has a different temperature from said second fluid; a fluid supply control valve actuator operatively connected to said fluid supply valve for actuating opening and closure operations thereof; a thermosensor thermally coupled with said mixing port to sense an estimated present temperature of a mixed fluid within said mixing port; a fluid control valve for regulating flow of a mixed fluid flow at said system outlet; a flow control valve actuator operatively connected to said flow control valve for actuating opening and closure operations thereof; a user interface including user input means for selecting a set temperature, flow rate and volume of fluid at said system outlet and user</p>	<p>Not a means-plus-function claim; plain and ordinary meaning.</p> <p>If M+F, alternatively:</p> <p>Function: storing and transferring data</p> <p>[AGREED] Structure: personal computer; electronic day planner; computerized building management system; external data processing device; personal data storage template; hard disk; floppy disk; zip or jaz drive; CD-ROM; magnetic or optical data storage devices</p>	<p>Means-plus-function term, governed by 35 U.S.C. § 112(f).</p> <p><u>Function:</u> storing and transferring data to said system control means to control one or more system function(s) or parameter(s)</p> <p><u>[AGREED] Structure:</u> personal computer; electronic day planner; computerized building management system; external data processing device; personal data storage template; hard disk; floppy disk; zip or jaz drive; CD-ROM; magnetic or optical data storage devices</p>	
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Intelligent Water Solutions, LLC v. Kohler, Co.
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display means for displaying one or more system functions or parameters; system control means for receiving signals from said thermosensor and user interface and for processing said signals to generate appropriate control signals to control said fluid supply control valve actuator(s) and said flow control valve actuator means to achieve programmed or user-selected set temperature, flow rate and volume at said system outlet; and external data storage and input means for storing and transferring data to said system control means to control one or more system function(s) or parameter(s).			
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